

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Chapter 13
	:	
ROBERT R. EPPS	:	Bankruptcy No. 16-24151-JAD
	:	
<i>Debtor,</i>	:	Related to Doc. No.
=====	:	
ROBERT R. EPPS	:	Hearing Date and Time:
	:	
<i>Movant,</i>	:	
vs.	:	
CITIMORTGAGE, INC.,	:	
<i>Respondent</i>	:	

**DEBTOR' REPLY TO OBJECTION OF MIDFIRST BANK
TO MOTION EXTEND THE LOSS MITIGATION PERIOD**

AND NOW come the Debtor, ROBERT R. EPPS, by and through the Debtor's Attorney, MICHAEL S. GEISLER, ESQUIRE, and file this Reply, of which the following is a statement:

1. Paragraphs 1 through 5 of Respondent's Objection are admitted.
2. A Transfer of Servicer Form has been filed and also the Servicer has been changed on the DMM portal.
3. A new LMP package will be submitted in the next few days.

WHEREFORE, the Debtor prays that this Court grant the Movant's to Extend the Loss Mitigation Period.

/s/ Michael S. Geisler

DATED: 9/11/2017

MICHAEL S. GEISLER, ESQUIRE
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CERTIFICATE OF SERVICE

I, MICHAEL S. GEISLER, ESQUIRE, Attorney for the Debtor, hereby certify that I have served a true and correct copy of the within Reply upon the following by electronic means:

RONDA J. WINNECOUR, TRUSTEE
3250 U.S. Steel Tower
Pittsburgh, PA 15219

JAMES C. WARMBRODT, ESQUIRE
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106

/s/ Michael S. Geisler

DATED: 9/11/2017

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